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Michael W. Sole
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VIA EMAIL
September 24, 2007

John McCrocklin
West Shore Associates
6608 South Westshore Blvd.
Tampa, Florida 33616

SUBJECT: Sampling Performance Audit
West Shore Associates Groundwater Monitoring
Sampling conducted October 30 - 31, 2006
WRS Infrastructure and Environment (consultant)

Dear Mr. McCrocklin:

Please find attached a list of findings of deficiency pursuant to the subject audit at the West Shore Associates property (former Wenczel Tile site) in Tampa, Florida, conducted on October 30, 2006.

Purpose of this audit
This audit was conducted in support of the DEP Hazardous Waste Regulation program.

The purpose of the audit was to determine if *WRS Infrastructure and Environment*, the consultant performing the sampling for your permitted facility, was capable of properly collecting samples according to established DEP SOP criteria. The evaluation of sampling procedures associated with data submitted to DEP for permit compliance is part of the Department's larger effort to ensure that data are of verifiable and acceptable quality according to criteria outlined in the DEP Quality Assurance rule, 62-160 FAC.

Evaluation criteria for this audit
Sampling performance was audited using the documentary and procedural criteria published in the "Standard Operating Procedures for Field Activities", DEP-SOP-001/01, revision February 1, 2004 (DEP SOPs).

Summary of the audit
During the audit, I observed the consultant's water level measurements at five wells and sampling performance at three monitoring wells, and asked the sampling team about various aspects of the sampling, as necessary. Stacie Davis, of the DEP Hazardous Waste Regulation Section, and Danielle Nichols, of the DEP Southwest District office, accompanied me for portions of the audit. At the conclusion of the audit, I held an exit meeting at the audit location with you, the samplers and Ms. Davis where we discussed the major deficiencies observed.

I also requested by email of Mr. Andy Hooper (WRS) that copies of all field documentation associated with the sampling that was generated by the consultant be sent to me as soon as possible after completion of the sampling event.

The consultant subsequently submitted documentation to DEP for the sampling event, as requested.

In preparation for this report, I examined all of the documentation that was sent to me. These records pertained to all of the monitoring wells sampled for the entire, scheduled sampling event. I also reviewed my field notes for the observed sampling at the three monitoring wells. Finally, I evaluated the consultant's records against my field notes and a standard audit checklist to determine the degree of compliance with DEP SOP criteria.

Summary of deficiencies
The list of deficiencies accompanying this letter summarizes my evaluation. In general, good techniques were used in the performance of sampling procedures, and most of the deficiencies are easily corrected when sampling for this permit in the future. However, one item concerning monitoring well construction should be resolved.

In particular, well screen construction dimensions must be verified. Even though purge stabilization was achieved, the observed tubing placement and purging/sampling procedure is in technical violation of the DEP SOP for groundwater sampling because the well screen depth interval is not known to the samplers and can only be assumed. If the screen dimensions are verified, the current technique can be modified to minimize the purge volume quantities and the appropriateness of the tubing placement can be justified.

Response to this audit report and final disposition of the report
You are not required to respond to this report. However, you and your consultant are encouraged to respond to any items contained in this report, at your discretion, for rebuttal, clarification or any other reason. Should you wish to respond to the DEP concerning this audit, please send the response to me by November 30th, 2007. After this date, if we have not received a response from you, we will finalize this audit and assume that the deficiencies listed in this report have been corrected by the consultant and the corrective actions will be applied to future sampling for this permit. Should you respond to this preliminary report, it will be revised as necessary, based on our review of your response and any other communications with you concerning the response. A copy of the revised, final report will be sent to you and copied to all affected parties.

Should you have any questions concerning this audit or need further assistance, please don't hesitate to contact me.

Sincerely,

Michael Blizzard
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Attachment: List of Findings of Deficiency

cc: Nicanor Madrid, DEP-HWRS
Andy Tintle, DEP-EAS
Stacie Davis, DEP-HWRS
Danielle Nichols, DEP-SWD
Shelton Graves, DEP-HWRS
Andy Hooper, WRS
Merlin Russell, WRS